

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

Civil Action No.: 1:19-cv-10116-LTS

|                                     |   |  |
|-------------------------------------|---|--|
| LUIS ANGEL RODRIGUEZ,               | ) |  |
| Plaintiff,                          | ) |  |
|                                     | ) |  |
| v.                                  | ) |  |
|                                     | ) |  |
| BOSTON PUBLIC SCHOOLS, and          | ) |  |
| SHAUN O. HARRISON, individually and | ) |  |
| in his official capacity            | ) |  |
| Defendants                          | ) |  |

**PLAINTIFFS' AUTOMATIC DISCLOSURES PURSUANT TO FED. R. CIV. P. 26  
(a)(1)(A) AND LOCAL R. 26.2.**

Pursuant to Fed. R. Civ. P. 26 (a)(1)(A) and D. Mass. Local Rule 26.2, Plaintiffs hereby make the following automatic disclosures:

**A. Persons likely to have discoverable information.**

1. Plaintiff Luis Angel Rodriguez.
2. Defendant Shaun O. Harrison.
3. Caitlyn Murphy. Ms. Murphy was Headmaster at the English High School, 144 McBride Street, Jamaica Plain, MA 02130.
4. Patricia Riordan. Ms. Riordan was the SESS Coordinator listed with regard to Mr. Rodriguez's Individualized Educational Program for the school year 2014-2015.
5. Lucas Rosen, Laurie Suzanne Green, Mark T. Sullivan, Lillian O'Flaherty, Berthlyn M. Bernier, and Sophia Viglas. Mr. Rodriguez's classroom teachers at the English High School in the school year 2014-2015.
6. Dr. Tommy Chang. Dr. Chang is the former Boston Public Schools' Superintendent selected who was selected to replace interim Superintendent John P. McDonough on or about the beginning of March 2015.

7. Karen A. Glasgow. Ms. Glasgow was the Director of Labor Relations at the Boston Public Schools, Office of Labor Relations who conducted an internal investigation of Mr. Harrison's employment history.

Plaintiffs reserve the right to supplement this list.

**B. Description of relevant documents.**

**All non-privileged documents are available for inspection at the Mann Law Firm, P.C., 200 Highland Avenue, Suite 300, Needham, MA 02494.**

1. Mr. Rodriguez's School Records
2. Mr. Rodriguez's Medical Records/Bills.

Plaintiffs reserve the right to supplement this list with documents obtained through discovery.

**C. Insurance Agreements.**

Not applicable.

**D. Expert Witnesses.**

Plaintiffs have not yet determined the witness(es) to be called as expert(s) at this trial, but recognize their obligation to supplement this response.

Respectfully submitted by counsel,

*/s/ Simon B. Mann*

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### **Certificate of Service**

I, Simon B. Mann, hereby certify that a true copy of the above document will be served upon all parties of record via this court's electronic filing system and to those non-registered participants via first class mail.

/s/ Simon B. Mann

Simon B. Mann